

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)
	) Case No. 16-10250
DEAN MAYNARD BOLAND,	)
	) Chapter 7
Debtor,	)
_____	) Judge Jessica Price-Smith

**MOTION OF DOV Y. FRANKEL FOR THE ENTRY OF AN ORDER AUTHORIZING  
MARTHA D. BOLTON TO APPEAR *PRO HAC VICE***

Dov Y. Frankel, of the law firm of Taft, Stettinius & Hollister LLP (“Taft”), moves this Court, pursuant to Local Bankruptcy Rule 2090-1 for the entry of an order admitting Martha D. Bolton to practice before this Court *pro hac vice* in this matter on behalf of John W. Forrest (the “Motion”). In support of this Motion, Dov Y. Frankel respectfully represents as follows:

1. I am an attorney at Taft and maintain my office at 200 Public Square, Suite 3500, Cleveland, Ohio 44114. I am a member in good standing of the Bar of the State of Ohio and admitted to practice before the United States District Court for the Northern District of Ohio, the United States District Court for the Southern District of Ohio, the United States District Court for the Western District of Pennsylvania, and the United States District Court for the District of Maryland.

2. Ms. Bolton is an attorney at the O’Connor Law Firm, and her contact information is as follows:

O’Connor Law Firm  
2240 Belleair Road  
Suite 115  
Clearwater, Florida 3374  
Telephone: (727) 539-6800  
Facsimile: (727) 536-5936  
E-Mail: martha@yourpersonalattorney.com.

Ms. Bolton is a member in good standing of the Bar of the State of Florida and the Bar of the State of Illinois and admitted to practice before the United States District Court for the Middle and Northern Districts of Florida and the United States Court of Appeals for the Eleventh Circuit . Further, Ms. Bolton understands that, pursuant to Local Bankruptcy Rule 2090-1(b), she is subject to the disciplinary processes of this Court.

3. Ms. Bolton is familiar with and will comply with the Bankruptcy Code (11 U.S.C. §§ 101 *et seq.*), the Federal Rules of Bankruptcy Procedure, and this Court's Local Rules.

4. A declaration of Ms. Bolton in support of this Motion is attached as Exhibit A.

WHEREFORE, the undersigned respectfully requests that this Court enter an order, substantially in the form attached hereto as Exhibit B admitting Ms. Bolton *pro hac vice* to appear before this Court in all matters pertaining to this case.

Respectfully submitted,

/s/ Dov Y. Frankel

Dov Y. Frankel (0077562)

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Attorneys for John W. Forrest

**CERTIFICATE OF SERVICE**

I certify that, on February 12, 2016, copies of the foregoing document were served via the Court's CM/ECF system to the following parties listed on the Court's Electronic Mail Notice List:

Stephen D. Hobt, on behalf of the Debtor, at shobt@aol.com

Richard A. Baumgart, Chapter 7 Trustee, at baumgart-trustee@dsb\_law.com

United States Trustee, on behalf of the United States Trustee at (Registered address)@usdoj.gov

/s/ Dov Y. Frankel  
Dov Y. Frankel